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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**AT&T'S RESPONSE TO STAFF'S
SUPPLEMENTAL REPORT ON
CHECKLIST ITEM NO. 11, LOCAL
NUMBER PORTABILITY.**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix
(collectively "AT&T") hereby file their comments on Staff's Supplemental Report on
Qwest's Compliance with Checklist Item No. 11-- Local Number Portability (LNP).

I. INTRODUCTION

Although AT&T has a number of comments on Staff's Report, due to the multitude of reports that AT&T is in the process of reviewing, AT&T does not have the time or the resources to verify the accuracy of Staff's summary of the facts and the various parties' positions. Therefore, AT&T reserves the right to raise omissions or inaccuracies in future pleadings or proceedings.

Furthermore, AT&T may elect not to respond to Staff's recommendations on a particular disputed issue. This should not be construed in this or any other proceeding as

an agreement by AT&T as to the manner in which Staff proposes to resolve the disputed issue.

II. ARGUMENTS

The Staff recommends that Qwest supplement the record with the vendor responses to the Request for Proposals (RFPs") on a fully automated solution.¹ Qwest advised the attendees at the November 14 CMP meeting that it had received the responses to the RFPs from three vendors. Qwest should supplement the record immediately in order to make the information available prior to a Commission decision.²

AT&T believes some ambiguity remains as to Staff's proposed recommendations and the language recommended by Staff on Disputed Issue No. 1. Staff's recommended language is contained in paragraph 15 of Staff's Report. Qwest's proposed language is at paragraph 16. AT&T cannot find any statement by Staff that it continues to recommend its language.

AT&T supports Staff's language. AT&T does not accept Qwest's language. Qwest's language is inconsistent with Qwest's latest offer contained on Qwest's website. Qwest's latest offer was attached to AT&T's response to Qwest's supplementation of the record. Contrary to Qwest's language that provides for an 8:00 p.m. cut off on the day of the port, Qwest agrees to ensure the customer is not disconnected up until noon on the next day following the port.

If Staff adopts Qwest's language contained in paragraph 16, AT&T proposes that the following language be added to the SGAT:

¹ Staff Report, ¶ 31.

² This is consistent with the Commission's recent decision on Checklist Item No. 10.

CLEC is required to make timely notifications of Due Date changes or cancellations by 8:00 p.m. mountain time on the Due Date through a supplemental LSR order. In the event CLEC does not make a timely notification, CLEC may submit a late notification to Qwest as soon as possible but in no event later than 12:00 p.m. mountain time the next business day after the Due date to Qwest's Interconnect Service Center in the manner set forth below. For a late notification properly submitted, Qwest agrees to ensure that the End User's service is not disconnected prior to 11:59 p.m. of the next business day following the new Due Date or, in the case of cancellation, no disruption of the End User's existing service. Late notifications must be made by calling Qwest's Interconnect Service Center followed by CLEC submitting a confirming supplemental LSR order.

Staff believes OP-17 will adequately monitor and reflect Qwest's performance.³

As noted in AT&T's Response on October 9, 2001, OP-17 is not consistent with Qwest's latest offer to allow CLECs until noon the next day following the scheduled due date to notify Qwest to delay the disconnect. Therefore, it will not capture all data, nor properly report Qwest's performance under its latest offer⁴. Staff does not address this issue in its Report, although AT&T raised it in its Response.

III. CONCLUSION

Issues remain that have not been addressed by Staff. Staff should address these issues and allow parties an opportunity to comment.

³ Staff Report, ¶ 35.

⁴ AT&T's Response at 4-5.

Respectfully submitted this 8th day of January 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.
AND TCG PHOENIX**

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CERTIFICATE OF SERVICE

I, Shirley S. Woo, hereby certify that the original and 10 copies of **AT&T's Response to Staff's Supplemental Report on Checklist Item No. 11, Local Number Portability** in Docket No. T-00000A-97-0238 were sent by overnight delivery on January 8, 2002 to:

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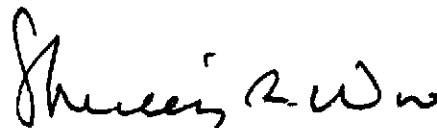
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Executed on January 8, 2002, in San Francisco, California.



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